Attorneys for Plaintiffs **One North Lexington Avenue** White Plains, New York 10601 914.681.9500

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK ____X

JENNIFER LUNDGREN,

-against-

LICARE CORPORATION d/b/a

JOHN DOES 1-10,

plaintiff herein.

Plaintiff,

BAKEROLESHIK 94-KAMAIN FD&CBHONSER, HILLER 07/02/2007 Page 1 of 5

07 Civ. 4534 (WP4)

PLAINTIFF'S RULE 26 INITIAL DISCLOSURE

SEAN G. JULIUS, SHARON L. DAVIS, VACCARO'S WINE & SPIRITS, and

Defendants. ____X

Plaintiff Jennifer Lundgren, by her attorneys Baker, Leshko, Saline &

Blosser, LLP, for its Initial Disclosure pursuant to FRCP 26, hereby states as follows:

FRCP 26(a)(1)(A): The names and addresses of individuals likely to have discoverable information are as follows:

Jennifer Lungren, 90 Bertolf Road, Riverside, CT 06878,the 1.

2. Sean G. Julius, 48 Oak Street, Port Chester, New York a defendant herein.

Case 7:07-cv-04534 RINK L. Davis 48 Pak Street 7021264 Step agenz York, a defendant herein.

- 4. Joseph Licare, c/o 124 Midland Avenue, Port Chester, New York 10573, the principal of defendant Licare Corporation, who may have testimony regarding the intoxicated state of Mr. Julius during the day of the accident.
- 5. Sanjay Bhatt, c/o Westchester County District Attorneys Office, Westchester County Courthouse, 111 Dr. Martin Luther King Blvd., White Plains, New York 10601, who may have testimony regarding Mr. Julius' drunk driving conviction.
- 6. Kristna Dushaj, c/o Westchester County District Attorneys Office, Rye Branch, 3010 Westchester Avenue, Suite 205, Purchase, new York 10577, who may have testimony regarding Mr. Julius' drunk driving conviction.
- 7. Police Officer A. V. Bellantoni, c/o Village of Port Chester Police Department, who may have testimony regarding the actual accident involved.
- 8. Certain physicians and other health care providers who treated Ms. Lundgren, including, certain persons at Westchester County Medical Center, Valhalla, New York and at the Orthopaedic Special Group, P.C. 75 Kings Highway Cutoff, Fairfield, CT 06824.

II Case FRGP 26(a) 61 (B) (A) Plaintiff presently is 100 to in our stody and or control of any documents in connection with this matter at the present time except those annexed hereto and Bates Numbered 00010-00064, and annexed hereto as Exhibit "A".

III. FRCP 26(a)(1)(C): Plaintiff will make claim for past, present and future pain and suffering, past present and permanent injuries and medical expenses incurred and to be incurred in the future. Plaintiff is unable at the present time to particularize the amount of such damages, but it is in an amount in excess of the jurisdictional limitation of this Court.

IV. FRCP 26(a)(1)D): Not applicable.

V. FRCP 26(a)(2)(A): Plaintiff has not retained any experts at the present time, and she will disclose any such information at the time such expert(s), if any, is retained and in accordance with the FRCP.

Dated: White Plains, New York July 2, 2007

BAKER LESHKO SALINE & BLOSSER LLP Attorneys for Plaintiffs

By: _______ Mitchell J. Baker (MB-4339) One North Lexington Avenue

White Plains, New York 10601

To: Leaby & Johnson, P.C. 120 Wall Street New York, New York 10093 Alto.: Steven Martin, Beq. See decuments Dates Number 0010 0064

See documents Bates Number 0010-0064